

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

FLORIBERTO ESPINOZA-SOSA

NO. 3:15-MJ-858-BF

MOTION FOR DETENTION

The United States moves for detention of defendant, **Floriberto Espinoza-Sosa**, pursuant to Crim. Rule 32.1(a)(6) and 18 U.S.C. §3143(a).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

____ Crime of violence (18 U.S.C. §3156);

____ Maximum sentence life imprisonment or death

____ 10 + year drug offense

____ Felony, with two prior convictions in above categories

X Serious risk defendant will flee

____ Serious risk obstruction of justice

____ Felony involving a minor victim

____ Felony involving a firearm, destructive device, or any other
dangerous weapon

____ Felony involving a failure to register (18 U.S.C. § 2250)

X Petition for Supervised Release Revocation was filed

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

☒ Defendant's appearance as required

☒ Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

☐ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

☐ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

☐ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

☐ Previous conviction for "eligible" offense committed while on pretrial bond

☒ Probable cause to believe Defendant violated terms of supervised release, FRCP 32.1(a)(6).

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

☐ At first appearance

☒ After continuance of 3 days (not more than 3).

DATED this 20th day of November, 2015.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

/s/ Lea A. Carlisle
LEA A. CARLISLE
Assistant United States Attorney
State Bar No. 24031793
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8600
Facsimile: 214-659-8803
Email: Lea.Carlisle@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on this 20th day of November, 2015.

/s/ Lea A. Carlisle
LEA A. CARLISLE
Assistant United States Attorney